

October 19, 2021

Brian C. Anderson, Chief
State Agreement and Liaison Programs Branch
Office of Nuclear Material Safety and Safeguards
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: NRC 2021 IMPEP Draft Report of Oregon Agreement State Program with
Cover Letter dated September 22, 2021

Dear Mr. Anderson:

Per your request, and on behalf of the leadership team from the Oregon Health Authority, Public Health Division, I am responding to your cover letter and Preliminary 2021 IMPEP Draft Report of the Oregon Agreement State Program dated September 22, 2021.

The Oregon Radiation Protection Services (RPS) Section, Radioactive Materials Licensing (RML) program management and staff have reviewed the IMPEP Draft Report and are pleased that all six performance indicators are satisfactory. We do not feel any amendments are necessary.

RPS management is implementing a plan to fully address the one recommendation regarding proper event documentation under the Technical Quality of Incident and Allegation Activities performance indicator noted in the IMPEP team's assessment of our program. RPS is committed to implementing the recommendation as a way for continuous program quality improvement.

The following response relates to the one IMPEP Draft Report team recommendation highlighted in the Section 5.0 Report Summary.

The team recommends that Oregon develop written protocols for maintaining logs to ensure incident response, and allegation procedures are in place, followed, and follow-up inspections are scheduled and completed, to ensure compliance with Oregon Protocol 606. As part of this recommendation, Oregon

perform a retrospective review of events from 2017 to present to ensure appropriate supporting information is documented in the log.

Our RPS Emergency Response Manager has been working with RML and Office of Information Services staff to transition from paper to electronic recordkeeping for inspections, and incident and allegation management, including development of a written protocol to ensure procedures are in place to complete follow up inspections and that there is compliance with Oregon Protocol 606. RPS is also initiating an internal audit process of events from 2017 to present to ensure supporting information is documented and transferred to electronic records as appropriate.

The Oregon RPS management team and staff will benefit from the IMPEP team recommendation which reinforces proper incident and allegation documentation. The IMPEP team's thoroughness and professionalism made the IMPEP process a positive and invaluable experience to strengthen our RML program and Oregon Agreement State/NRC relationship.

Please contact me if you have any questions concerning this correspondence.

Sincerely,

David Howe

David M. Howe, Program Director
Radiation Protection Services Section

cc: Rachael Banks, MPA- Director, Public Health Division
André Ourso, MPH, JD- Administrator, Center for Health Protection